

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CANDY M. SOUSA, on behalf of herself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30022 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

YOSEF STREICHER, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30026 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

[Captions continued on next page]

**MOTION TO CONSOLIDATE ACTIONS,
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF LEAD
PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

RAFAT DAWOD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
STEVEN K. SPRAGUE, and GERARD T.
FEENEY,

Defendants.

Civil Action No. 3:04-CV-30029 (MAP)

ALVIN CHESS, individually and on behalf
all others similarly situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
STEVEN K. SPRAGUE, and GERARD T.
FEENEY,

Defendants.

Civil Action No. 3:04-CV-30037 (MAP)

MICHAEL VICKER, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,
JOHN E. BAGALAY, JR., STEVEN K.
SPRAGUE, and GERARD T. FEENEY,

Defendants.

Civil Action No. 3:04-CV-30040 (MAP)

[Captions continued on next page]

H. MARTIN BOHMAN, individually and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30041 (MAP)

JIMMY SUO, on behalf of himself and all)
others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30042 (MAP)

JACK SCHULMAN, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30043 (MAP)

PLEASE TAKE NOTICE that class members Anne Brumbaugh, Gary L. Harmon and Randy K. Griffin (collectively, the "Brumbaugh Plaintiff Group"), by their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (i) consolidating the Actions; (ii) appointing the Brumbaugh Plaintiff Group as lead plaintiffs; (iii) approving the Brumbaugh Plaintiff Group's selection of the law firm of Schiffrin & Barroway, LLP to serve as lead counsel; (iv) approving the Brumbaugh Plaintiff Group's selection of the law firm of Gilman and Pastor, LLP to serve as liaison counsel; and (v) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Brumbaugh Plaintiff Group submits herewith a memorandum of law and declaration of David Pastor.

Dated: April 2, 2004.

Respectfully submitted,

GILMAN AND PASTOR, LLP

By: /s/ David Pastor

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